

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
L. D. Redmer Screw Products, Inc. for Renewal of the
Federally Enforceable State Operating Permit (FESOP) for
515 Thomas Drive
Bensenville, Illinois 60106

Site Identification No.: 043414AAM
Application No.: 74110001

Illinois EPA Contacts:
Permit Analyst: David Hulskotter
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PROJECT SUMMARY

I. INTRODUCTION

L. D. Redmer Screw Products, Inc. has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its manufacturing facility at 515 Thomas Drive in Bensenville. This plant requires an air pollution control operating permit because it is a source of emission. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before renewing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit it would propose to issue.

II. SOURCE DESCRIPTION

The facility manufactures a variety of screw products. The air contaminant emission sources include a vapor degreaser using the solvent trichloroethylene and a cold cleaning solvent degreaser.

Solvent degreasing is the physical process of using organic solvents to remove grease, fats, oils, wax or soil from various metal, glass or plastic items. Nonaqueous solvents such as petroleum distillates, chlorinated hydrocarbons, ketones and alcohols are used. The metalworking industries are the major users of solvent degreasing.

Open top vapor degreasers are batch loaded boiler degreasers that clean with condensation of hot solvent vapor on colder metal parts. Trichloroethylene is a halogenated solvent. This is used because halogenated solvents are not flammable and their vapors are much heavier than air. The cold cleaning degreasing refers to maintaining the organic solvent below its boiling point.

The degreasers emit air contaminants due to the solvents evaporating into the atmosphere. Trichloroethylene is classified as a hazardous air pollutant and also as a volatile organic material air emission. The vapor degreaser emits the hazardous air pollutant trichloroethylene. The cold cleaning degreaser uses a solvent that is not a hazardous air pollutant. In this case only volatile organic material emissions are emitted into the atmosphere.

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of FESOPs can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has been operating this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

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The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

V. CONTENTS OF PERMIT

The renewed permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant. As explained, the (PRINCIPAL EMISSION UNIT(S) IS/ARE) subject to (RULE), which requires (DESCRIPTION OF STANDARD). The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit conditions would also continue to establish appropriate compliance procedures, including inspection practices

as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for renewal of its permit. The Illinois EPA is therefore proposing to renew the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.

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